

EXHIBIT B

ATTORNEY WORK PRODUCT REDACTED

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Mark Bennett [<mailto:mbennett@starnlaw.com>]

Sent: Monday, July 11, 2016 12:35 PM

To: Scannell, Michelle; Andrew Lautenbach; JJ Conway

Cc: Orian Lee; 'Michael Lilly' (Michael@nljlaw.com); Slaughter, Kathleen Cahill; lmunger@goodsill.com;

Terada, Christine A. (cterada@goodsill.com)

Subject: RE: Proposed Amendment to QPO Regarding Consultants and Expert Witnesses

Michelle,

Please let the Court know that given that you raised this issue late last week for the first time, we do not see this as a matter that is exigent, or that can't be handled by the Court in the ordinary course.

That being said, we will, of course, defer to the Court on the scheduling (but again, we do not see this matter as an exigent one, and ask you to so inform the Court of our view).

Mark Bennett
(808) 372-1404 (cell)

From: Scannell, Michelle [<mailto:MScannell@seyfarth.com>]
Sent: Monday, July 11, 2016 9:21 AM
To: Andrew Lautenbach; JJ Conway
Cc: Orian Lee; Mark Bennett; 'Michael Lilly' (Michael@nljlaw.com); Slaught, Kathleen Cahill; lmunger@goodsill.com; Terada, Christine A. (cterada@goodsill.com)
Subject: RE: Proposed Amendment to QPO Regarding Consultants and Expert Witnesses

Andrew,

KFHP will not agree to the proposal insofar as it contemplates requiring advance disclosure of experts and/or consultants, and identification of the materials to be provided to such individuals. As you are likely aware, this is not required under the FRCP. KFHP also cannot agree to disclosure of highly confidential material to Mr. Riddle. Until recently, Mr. Riddle held the title of General Counsel of HLF, and based on his recent representations to counsel for KFHP at depositions, it is our understanding that he is still providing litigation support to HLF in an in-house capacity. The fact that Mr. Riddle no longer holds the title of General Counsel and has entered an appearance as outside counsel for HLF in this matter should not be dispositive as to his access to material under the QPO. Disclosure of highly confidential material to an individual who until very recently served as an officer of a party and continues to represent the party would contravene a core purpose of the QPO, which is to limit disclosure of highly confidential material to employees and officers of the parties, to prevent the parties from attempting to obtain such information for use in the parties' business dispute and in the Hawaii marketplace as it relates to HLF's sole competitor.

Based on your agreement to letter briefing "on whatever schedule the court might impose," and your unavailability to discuss Friday, and the next two business days, we will proceed with contacting the Court to obtain a briefing deadline on the issues identified above.

Regards,

Michelle

Michelle Scannell | Seyfarth Shaw LLP
560 Mission Street | 31st Floor | San Francisco, California 94105-2930
Direct: +1-415-732-1131
msscannell@seyfarth.com | www.seyfarth.com



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From: Andrew Lautenbach [<mailto:alautenbach@starnlaw.com>]

Sent: Friday, July 08, 2016 8:48 PM

To: Scannell, Michelle; JJ Conway

Cc: Orian Lee; Mark Bennett; 'Michael Lilly' (Michael@nljlaw.com); Slaughter, Kathleen Cahill; lmunger@goodsill.com; Terada, Christine A. (cterada@goodsill.com)

Subject: RE: Proposed Amendment to QPO Regarding Consultants and Expert Witnesses

Michelle,

HLF and AMRG will agree to your proposed changes to your protective order, with the following understanding:

The treatment of "highly confidential" documents will be the same for any document marked "highly confidential," regardless of which party (or non-party) produces the document;

The party seeking to provide highly confidential material to an expert or consultant must first identify the expert(s) or consultant(s), and identify the materials to be provided to such individuals. Should the producing party object, the materials shall not be provided to the expert(s) or consultant(s) absent direction from the court;

Mr. Riddle, who is now outside counsel for HLF and AMRG, shall have access to highly confidential material, as does other outside counsel for the parties.

If any of the above is not acceptable to you, we will agree to letter briefing on whatever schedule the court might impose.

I am in a two-day mediation on Monday and Tuesday in a complex multi-party case, so it is unlikely that I will be available for a telephonic meet and confer on those days.

Andrew J. Lautenbach
Attorney at Law

Starn O'Toole Marcus & Fisher
A Law Corporation
Pacific Guardian Center, Makai Tower
733 Bishop Street, Suite 1900
Honolulu, HI 96813
Email: ALautenbach@starnlaw.com
Telephone: (808) 537-6100
Facsimile: (808) 537-5434
Website: www.starnlaw.com

From: Scannell, Michelle [<mailto:MScannell@seyfarth.com>]

Sent: Friday, July 08, 2016 1:30 PM

To: JJ Conway

Cc: Andrew Lautenbach; Orian Lee; Mark Bennett; 'Michael Lilly' (Michael@nljlaw.com); Slaughter, Kathleen Cahill; lmunger@goodsill.com; Terada, Christine A. (cterada@goodsill.com)

Subject: RE: Proposed Amendment to QPO Regarding Consultants and Expert Witnesses

J.J., Kathleen will be responding to you this evening.

Andrew, assuming you are unavailable today, please advise as to your availability for a call Monday.

Thank you,

Michelle

Michelle Scannell | Seyfarth Shaw LLP

560 Mission Street | 31st Floor | San Francisco, California 94105-2930

Direct: +1-415-732-1131

msscannell@seyfarth.com | www.seyfarth.com

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From: JJ Conway [<mailto:jj@jjconwaylaw.com>]

Sent: Friday, July 08, 2016 1:09 PM

To: Scannell, Michelle

Cc: Andrew Lautenbach; Orian Lee (olee@starnlaw.com); mbennett@starnlaw.com; 'Michael Lilly' (Michael@nljlaw.com); Slaughter, Kathleen Cahill; lmunger@goodsill.com; Terada, Christine A. (cterada@goodsill.com)

Subject: Re: Proposed Amendment to QPO Regarding Consultants and Expert Witnesses

Hello - we are still waiting on the requested deposition dates. We need confirmation on the dates right away.

Many thanks, JJC

On Friday, July 8, 2016, Scannell, Michelle <MScannell@seyfarth.com> wrote:

Andrew,

Please advise as to your availability today for a call to discuss. I am generally available until 6pst, except from 2-3pst. If we are unable to reach an agreement we would like to move forward with letter briefs as soon as possible.

Thank you,

Michelle

Michelle Scannell | Seyfarth Shaw LLP

560 Mission Street | 31st Floor | San Francisco, California 94105-2930

Direct: +1-415-732-1131

msscannell@seyfarth.com | www.seyfarth.com

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From: Scannell, Michelle